

1 REMARKS

2 Status of the Claims

3 Claims 1-22 are pending in the application, Claims 1, 14, 15 and 21 having been amended to
4 more clearly distinguish the subject matter from the cited art, and Claims 2 and 15 having been
5 amended to correct typographical errors.

6 Amendment to the Specification

7 Applicants have amended a portion of the specification to correct the misspelling of the word
8 "reside" to "resize" and to correct a formatting error that resulted in a phrase being inadvertently
9 omitted from a sentence. The phrase that has been added does not constitute new matter, since the
10 substance recited by the phrase will be readily evident from the remainder of the specification as
11 filed.

12 Claims Rejected under 35 U.S.C. § 103(a)

13 The Examiner has rejected Claims 1-22 as being unpatentable by Rempell (U.S. Patent
14 Application No. 2004/0148307, hereinafter referred to as "Rempell") in view of Teague, "DHTML
15 and CSS for the World Wide Web," public release date May 22, 2001. The Examiner asserts that it
16 would have been obvious to a person of ordinary skill in the art at the time the invention was made to
17 have modified Rempell's teaching by providing a panel's interface objects built with HTML, dynamic
18 HTML, JavaScript, and Cascading Style Sheets, with means for detecting the change in the visual
19 appearance of decorative panels in accord with Teague's teaching. The Examiner asserts that one of
20 ordinary skill in the art would have been motivated to make this combination to provide the following
21 advantages: support by most browsers, small file sizes, no plug-ins required, easy to learn, fast
22 development, faster Web experience, no Java programming required (as taught by Teague at page
23 171). Applicants respectfully disagree for the following reasons.

24 In the interest of reducing the complexity of the issues for the Examiner to consider in this
25 response, the following discussion focuses on independent Claims 1, 14, and 21. The patentability of
26 each dependent claim is not necessarily separately addressed in detail. However, applicants' decision
27 not to discuss the differences between the cited art and each dependent claim should not be
28 considered as an admission that applicants concur with the Examiner's conclusion that these
29 dependent claims are not patentable over the cited references. Similarly, applicants' decision not to
30 discuss differences between the prior art and every claim element, or every comment made by the

1 Examiner, should not be considered as an admission that applicants concur with the Examiner's
2 interpretation and assertions regarding those claims. Indeed, applicants believe that all of the
3 dependent claims patentably distinguish over the references cited. However, a specific traverse of the
4 rejection of each dependent claim is not required, since dependent claims are patentable for at least
5 the same reasons as the independent claims from which the dependent claims ultimately depend.

6 Patentability of Independent Claim 1

7 A significant difference exists between the cited art and the recitation of applicants'
8 independent Claim 1 because the cited art does not teach or suggest the recitation in this claim of:
9 (1) a revision to the at least one attribute of the at least one element *of the table*; (2) producing a
10 change in the visual appearance of the *decorative* panel; and, (3) automatically applying the revision
11 so as to modify any other region affected by the change in a manner consistent with the change in the
12 visual appearance of the decorative panel. It may be helpful to summarize an example from the
13 specification that illustrates the steps of applicants' independent Claim 1. Applicants' step (a) has
14 been amended to include a portion of the preamble relating to the definition of a decorative panel and
15 recites:

16 detecting the change in the visual appearance of the decorative panel that comprises a
17 plurality of separate but visually related regions defined by the table;

18 To assist the Examiner in better understanding this step, he should refer to APPENDIX C of
19 the application, which illustrates a table that defines the regions of FIGURE 3A. This Figure shows a
20 decorative panel 70a that is in the process of being resized. FIGURE 3A includes regions such as
21 right border region 74 and top right corner region 76. These individual graphic regions of the
22 decorative panel that appear visually integrated, correspond to table cells defined in APPENDIX C.
23 Thus, although region 74 of the decorative panel is defined separately from region 76 in
24 APPENDIX C, they are visually related when rendered, since as can be seen, region 74 forms one
25 side of a rectangle that frames the text, and region 76 adds a rounded corner that combined with the
26 other separate regions, presents a specific visual appearance. In addition, in this example, a Web
27 page designer is able to resize decorative panel 70a, as shown in FIGURE 3A, by selecting and
28 dragging handle 73. Thus, this is a change in the visual appearance, because after being resized in
29 this manner, the decorative panel 70a has been enlarged.
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1 FIGURE 7 illustrates a flow diagram illustrating the logic for detecting a changed property of
2 a decorative panel. For example, a DOM of the Web page design tool identifies a region affected by
3 the user's change at a step 134, and the DOM identifies one or more properties of the region that are
4 affected by the user's change, which may include determining a height and width of a bounding box
5 that the user has resized. (Applicants' specification, page 15, line 28-page 16, line 3.) Thus, a
6 change (i.e., the resizing) has been detected in the visual appearance of the decorative panel that
7 comprises a plurality of separate but visually related regions defined by the table.

8 Second, applicants' step (b) of Claim I recites:

9 associating the visual appearance of the decorative panel with at least one element of
10 the table

11 In regard to this step, applicants' disclosure further explains:

12 FIGURE 4 is a structure diagram illustrating a preferred predefined logical structure
13 of a decorative panel 80. Any decorative panel may contain one or more regions illustrated
14 in decorative panel 80. For example, the samples described with regard to FIGURES 3A
15 and 3B included at least a content region 82, a right border region 84, a bottom border
16 region 85, and a top right corner region 86. Any combination of regions may be filled with
17 an image, colored, or otherwise formatted to achieve a desired appearance. *The layout of*
18 *regions illustrated in decorative panel 80 enable approximately 65,000 different patterns.*
19 *These patterns are recognized by a knowledge base of rules that are used to detect and*
20 *validate decorative panels being created and/or revised with the Web page design tool. The*
21 *rules are defined as first order logic and ensure that integrated operations are only applied*
22 *to HTML table cells that are intended to comprise decorative panels, and not applied to*
23 *HTML table cells that are intended to comprise conventional data tables, or other tables not*
24 *intended to be decorative panels. (Emphasis added, applicants' specification, page 11,*
25 *lines 17-page 12, line 2.)*

26 As highlighted in the italicized portion above, these regions illustrated in decorative panel 80
27 of FIGURE 4 enable approximately 65,000 different patterns recognized by a knowledge base of
28 rules. The rules ensure integrated operations are only applied to HTML table cells intended to
29 comprise decorative panels. Thus, the visual appearance (i.e., the regions of FIGURE 3A) is
30 associated with at least one element of the table (i.e., the HTML table cells intended to comprise
decorative panels).

 Applicants' step (c) of Claim 1 recites (with emphasis added):

 determining a *revision to the at least one attribute of the at least one element of the*
table corresponding to the change in the visual appearance of the decorative panel;

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2 In illustration of this step, FIGURE 3A shows decorative panel 70a. The change in the visual
3 appearance of decorative panel 70a results from resizing to expand its limits from original bounding
4 box 72a, to resized bounding box 72b (see applicants' specification, page 9, lines 20-21) as shown in
5 FIGURE 3B. The accompanying disclosure explains how, in order to maintain its visual integration,
6 revisions are determined for the at least one attribute of the at least one element of the table. To
7 illustrate, these revisions are determined because: (1) right border region 74 was relocated to a new
8 right edge of resized bounding box 72b and was extended downward approximately to a bottom edge
9 of resized bounding box 72b; and, (2) bottom border region 75 was relocated to the bottom edge of
10 resized bounding box 72b and extended approximately to the right edge of resized bounding box 72b.
11 FIGURE 8 is a flow diagram illustrating the logic for determining changes (i.e., revisions) required to
12 the property container and partition tree for each panel region that is affected by the user's change.
13 Step 146 determines whether the change to the property container indicates that a region was added,
14 deleted, relocated, or resized (applicants' specification, page 16, lines 21-24). But each of these
15 changes affects the coordinate of the region or of the entire decorative panel. *Id.*, lines 24-25. The
16 result is that the Web page design tool changes the coordinates in the partition tree defining the
17 location and bounding area of a changed region or of the entire decorative panel. *Id.*, lines 26-27. A
18 further result is that the panel manager computes attribute values such as height and/or width that are
19 needed to generate or revise cell elements of the table or to revise the table element (applicants'
20 specification, page 18, lines 14-19). Thus, a revision is determined to the at least one attribute of the
21 at least one element of the table, and this revision corresponds to the change in the visual appearance
22 of the decorative panel.

23 Applicants' step (d) of amended Claim 1 recites:

24 automatically applying the revision to the at least one attribute of the at least one
25 element of the table so as to modify any other region affected by the change in ~~the~~ a
26 manner consistent with the change in the visual appearance of the decorative panel

27 The accompanying disclosure in applicants' specification provides an example of this step, as
28 follows:
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30

1 FIGURE 3B is a partial screen shot of the inventive Web page design tool,
2 illustrating a resized decorative panel 70b that maintains its visual integration as a result of
3 the relationships among visual regions that correspond to individual table cells. The table
4 cells corresponding to the visual regions of decorative panel 70b have been automatically
5 updated to reflect resized and/or relocated visual regions that fit the new dimensions of
6 resized bounding box 72b. For instance, the table cell corresponding to right border
7 region 74 was automatically updated in relation to relocating right border region 74 to a new
8 right edge of resized bounding box 72b, and extending right border region 74 downward to
9 approximately a bottom edge of resized bounding box 72b. Similarly, the table cell
10 corresponding to bottom border region 75 was automatically updated in relation to
11 relocating bottom border region 75 to the bottom edge of resized bounding box 72b, and
12 extending border region 75 to approximately the right edge of resized bounding box 72b.
13 The above automatic steps cause the table cells corresponding to right border region 74 and
14 bottom border region 75 to maintain a visually integrated appearance, as if they indeed were
15 all part of an integral border. Similarly, the table cell corresponding to top right corner
16 region 76 is automatically updated to maintain a visually integrated appearance in relation to
17 the table cell corresponding to right border region 74 after right border region 74 is
18 automatically relocated to the right edge of resized bounding box 72b. Likewise, when the
19 Web page designer simply selected and dragged handle 73, **other table cells**
20 **corresponding to other regions of originally sized panel 70a were automatically**
21 **updated to reflect resizing and/or relocating of the other regions that are related as**
22 **adjacent regions.** Re-rendering the updated table cells produces resized panel 70b. *The*
23 *corresponding HTML table code was automatically revised to reflect new properties of the*
24 *visual regions.* The HTML code defining resized decorative panel 70b is provided in
25 Appendix D. (Emphasis added, applicants' specification, page 10, lines 4-27.)

18 As highlighted in the italicized portion above, applicants' specification explains how the
19 corresponding HTML table code (such as the table cells corresponding to the relocations as
20 illustrated in Appendix D) was automatically revised. In addition, as highlighted in the bold font
21 portion above, other table cells corresponding to other regions of originally sized panel 70a were
22 automatically updated to reflect resizing and/or relocating of the other regions that are related as adjacent
23 regions. Thus, there was an automatic revision to *the at least one attribute of the at least one element of*
24 *the table.*

25 In contrast, the cited art does NOT teach or suggest determining a revision to the at least one
26 attribute of the at least one element of the table because: (1) any changes the cited art makes, occur
27 as a result of the client's browser and computing device and are not in a table; and; (2) changes taught
28 by the cited art are not changes in the visual appearance of the *decorative* panel, but instead, are
29 changes in the visual appearance of a *functional* panel. In addition, the cited art does NOT teach or
30

1 suggest automatically applying a revision so as to modify any *other region* affected by the change,
2 because any change taught by the cited art only affects the region to which the change is made.

3 In support of his rejection of Claim 1, the Examiner asserts that the cited art teaches the
4 equivalent of applicants' step (c), because Rempell (paragraph 0120 and FIGS. 46-47) discloses the
5 visualization of an implementation of a Java Script child window, wherein a change text button style
6 pop-up window is displayed. The Examiner also indicates that the Screen shot in FIGURE 47 of
7 Rempell shows the result after the user selected the "Define the Mouse Down Text Button Style"
8 child pop-up window. Paragraph 0120 is reproduced below:

9 Another interface extension is selection from a JavaScript child window at 50B. This
10 technique helps simplify the number of choices given to the user in a complex pop-up
11 window operation. A selection from a JavaScript child window can be supported as
12 follows. **The panel's (panel 400) JavaScript opens the pop-up window.** The pop-up
13 window and its child pop-up windows' initial values are set from the JavaScript
14 database defined in the panel 400. The pop-up window's JavaScript opens the child
15 pop-up window and sets its initial values. The child pop-up window's JavaScript calls
16 the pop-up window's JavaScript when a completion event occurs. The pop-up
17 window's JavaScript reads the child pop-up window's values, sets those values to its
18 own internally defined variables, and calls the panel's JavaScript. **The panel's**
19 **JavaScript reads the pop-up window's values (which include the settings for its**
20 **own fields as well as those of its child windows), updates its database, and calls**
21 **the appropriate build engine 352 method, passing as arguments the necessary**
22 **data and status conditions.** Screen shots FIGS. 46-47 show a visualization of an
23 implementation of a JavaScript child window. Screen shot FIG. 46 show a change text
24 button style pop-up window. Screen shot FIG. 47 shows the result after the user
25 selected the "Define the Mouse Down Text Button Style" child pop-up window.
26 (Emphasis added, Rempell, paragraph 0120.)

27 The Examiner further asserts that the cited art teaches the equivalent of applicants' step (d)
28 because Rempell (paragraph 0144 and FIG. 37) discloses the menus and submenus that are defined as
29 a set of (DHTML) objects, one for each menu choice, nested inside a dynamic hypertext markup
30 language object that defined the entire menu. Each menu object is given absolute positioning while
the menu items are given absolute positioning relative to the menu objects' origin. Both the entire
menu and each choice are assigned CSS styles to define their visual appearances. The Examiner
indicates that he reads the above in the broadest reasonable interpretation to the claim recitation,
wherein automatically applying the revision to the at least one attribute of the at least one element of
table to modify any other region affected by the change in the manner consistent with the change in

1 the visual panel and the decorative panel would have been an obvious variant of the HTML objects.
2 Applicants respectfully disagree.

3 As will be apparent from the bold font portion in paragraph 0120 above, Rempell teaches how
4 the panel's (i.e., item 400) JavaScript opens the pop-up window and reads the pop-up window's
5 values, updates its database, and calls the appropriate build engine 352 method, passing as arguments
6 the necessary data and status conditions. The Examiner has not specified what element in Rempell he
7 believes is equivalent to applicants' table, but the Examiner asserts that Rempell's interface includes
8 a panel (item 400) (Office Action, page 2). Applicants therefore assume that the Examiner is
9 asserting that item 400 of Rempell is equivalent to applicants' decorative panel. The Examiner also
10 asserts that the panel's interface objects, tool bar (item 440) color, and alert message interface
11 technologies are built with HTML, DHTML, JavaScript, and Cascading Style Sheets (CSS) (Office
12 Action, page 3). But, as recited by applicants' claim, any revision must be to the table that defines
13 the decorative panel, not to a Java database or a combination of HTML, DHTML, JavaScript, and
14 Cascading Style Sheets (CSS) that define the panel. Therefore, the cited art does not teach or suggest
15 a revision to the at least one attribute of the at least one element of the table, as recited in applicants'
16 step (c), or a table that defines the plurality of separate but visually related regions of the decorative
17 panel, as recited in applicants' step (a). Also, a pop-up window is not a change in a decorative panel
18 but is instead produced in response to a change in a functional panel.

19 It is not an obvious variant of DHTML to automatically apply a revision to modify any other
20 region affected by a change to one region, because there is no evidence that the cited art modifies any
21 other revision in a manner that is consistent and which corresponds to the approach recited by
22 applicants' claim. The Examiner appears to assert that Rempell teaches this step because in Rempell,
23 when a menu selection is made, a submenu selection will appear relative to the position of the menu
24 and thus, the appearance of the submenu is an example of a change. However, this change results
25 from a functional panel being activated, not due to a change in a decorative panel. In addition, parts
26 of the functional panel of Rempell (i.e., other visually related regions of the functional panel) are not
27 modified in a manner consistent with the change in the visual appearance of a decorative panel. Parts
28 of the functional panel of Rempell are currently obscured under the menu and submenu and thus, any
29 alleged change occurs in a manner inconsistent with the change in the visual appearance of a
30 decorative panel. There is no automatic application of the revision so as to modify any other region

1 affected by the change in a manner consistent with the change in the appearance of the decorative
2 panel. Accordingly, the rejection of independent Claim 1 under 35 U.S.C. § 103(a) over Teague and
3 Rempell should be withdrawn, since Teague and Rempell do not teach or suggest all of the recitation
4 of independent Claim 1.

5 Claims 2-13 ultimately depend from independent Claim 1. Because dependent claims
6 inherently include all of the steps or elements of the independent claim from which the dependent
7 claims ultimately depend, dependent Claims 2-13 are patentable for at least the same reasons
8 discussed above with regard to independent Claim 1. Accordingly, the rejection of dependent
9 Claims 2-13 under 35 U.S.C. § 103(a) over Teague and Rempell should also be withdrawn.

10 Patentability of Independent Claim 14

11 Independent Claim 14 is directed towards a system for automatically formatting a table to
12 reflect a change in a visual appearance of a decorative panel that comprises a plurality of separate but
13 visually related regions defined by the table.

14 The Examiner has rejected these steps for the same reasons applied to independent Claim 1,
15 and further in view of Rempell, page 1, paragraph 0001. Again, the Examiner applies a broad
16 interpretation to the claim recitation and concludes that a processor, a display, and a memory would
17 have been an obvious variant of a computer system used for building a web site having a browser-
18 based build engine.

19 Nevertheless, for reasons similar to those discussed above in connection with independent
20 Claim 1, independent Claim 14 also distinguishes over Teague and Rempell, because Teague and
21 Rempell do not teach applicants' revision to the at least one attribute of the at least one element *of the*
22 *table*, do not teach a change to a *decorative* panel, and do not teach automatically applying the
23 revision so as to modify *any other region affected by the change* in a manner consistent with the
24 change in the visual appearance of the decorative panel.

25 Accordingly, the rejection of independent Claim 14 under 35 U.S.C. § 103(a) over Teague
26 and Rempell should be withdrawn, since Teague and Rempell do not teach or suggest all of the
27 elements of independent Claim 14.

28 Claims 15-20 ultimately depend from independent Claim 14. Because dependent claims
29 inherently include all of the steps or elements of the independent claims from which the dependent
30 claims ultimately depend, dependent Claims 15-20 are patentable for at least the same reasons

1 discussed above with regard to independent Claim 14. Therefore, the rejection of dependent
2 Claims 15-20 under 35 U.S.C. § 103(a) over Teague and Rempell should be withdrawn

3 Patentability of Independent Claim 21

4 Independent Claim 21 is directed towards a method for automatically formatting a plurality of
5 cells of a table in a Web document responsive to a change in visual appearance of a decorative panel
6 comprising a plurality of regions mapped to the plurality of cells of the table. The Examiner asserts
7 that the steps of this method incorporate subject matter substantially similar to that recited in Claim 1
8 and thus, the Examiner rejects the claim using the same rationale applied in the rejection of Claim 1.
9 However, the Examiner should note that the steps of this method claim are different from the steps of
10 the other method claim, although related. It is not clear to applicants where the Examiner believes
11 the cited art teaches each step recited in applicants' Claim 21. For example, applicants' step (c)
12 recites:

13 automatically applying:

- 14 (i) the change to an attribute of a cell that is mapped to the
one region; and
15 (ii) the change to the attribute of each cell that is mapped to
16 each related region, thereby creating a formatted table.

17 However, there is no indication or suggestion in the cited art that any change is automatically applied
18 to an *attribute of a cell that is mapped to a region*. Again, a change to a decorative panel is recited
19 by applicants' claim, but the cited art does not teach or suggest a change to a decorative panel but
20 instead, only discusses a functional panel.

21 Accordingly, the rejection of independent Claim 21 under 35 U.S.C. § 103(a) over Teague
22 and Rempell should be withdrawn, since Teague and Rempell do not teach or suggest all of the
23 elements recited in independent Claim 21.

24 Claim 22 ultimately depends from independent Claim 21. Because dependent claims
25 inherently include all of the steps or elements of the independent claims from which the dependent
26 claims ultimately depend, dependent Claim 22 is patentable for at least the same reasons discussed
27 above with regard to independent Claim 21. Therefore, the rejection of dependent Claim 22 under
28 35 U.S.C. § 103(a) over Teague and Rempell should be withdrawn.

29 In view of the Remarks set forth above, it will be apparent that the claims remaining in this
30 application define a novel and non-obvious invention, and that the application is in condition for

1 allowance and should be passed to issue without further delay. Should any further questions remain,
2 the Examiner is invited to telephone applicants' attorney at the number listed below.

3 Respectfully submitted,
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9 SKM/RMA:clm
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